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YOUTUBE, LLC and GOOGLE, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

CASE NO.: 4:22-md-03047-YGR

**DECLARATION OF
CHRISTOPHER CHIOU IN
SUPPORT OF DEFENDANTS
YOUTUBE, LLC AND GOOGLE
LLC'S OMNIBUS STIPULATION
TO SEAL**

This Document Relates to:

ALL ACTIONS

Honorable Yvonne Gonzalez Rogers
Honorable Peter H. Kang

I, Christopher Chiou, declare as follows:

1. I am a partner at the law firm of Wilson Sonsini Goodrich & Rosati and attorney of record for Defendants YouTube, LLC and Google LLC (collectively (“YouTube”) in *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, Case No.: 4:22-md-03047-YGR. I am licensed to practice law in the state of California and am admitted to practice before this Court. I submit this declaration in support of the Omnibus Sealing Stipulation Regarding Dkt. Nos. 848, 849. I have personal knowledge of the facts set forth in this declaration, and I could and would testify competently to their truth if called upon to do so.

2. On May 15, 2024, the Parties filed the Joint Letter Brief on Whether YouTube Must Designate Additional Custodians (the “Joint Letter Brief”) and its exhibit. ECF Nos. 848-849.

3. I have reviewed the document that YouTube seeks to redact pursuant to the Court’s Order Granting Motion to File Under Seal; Setting Sealing Procedures (ECF No. 341). Based on my review of the Joint Letter Brief and in consultation with my client, I understand there is good cause to seal the following information:

Item	Information To Be Sealed	Basis For Sealing
1	Joint Letter Brief on Whether YouTube Must Designate Additional Custodians, (ECF No. 848), redacted at 1, 2, 3.	The redacted portions contain titles and descriptions of Google and YouTube employees’ positions tied to their first and last initials that significantly increase the possibility of the public being able to find the employee’s information and subject them to unwarranted threats and harassment. For example, the personally identifying information includes quotations from employees’ LinkedIn profiles and from a book written about YouTube that could be searched to locate who the employee is and pose the possibility of subjecting them to unwarranted threats and harassment.
2	Exhibit A to the Joint Letter Brief on Whether YouTube Must Designate Additional Custodians (ECF No. 849), sealed in full.	This Exhibit contains the abbreviated names, titles, job descriptions, quotes, comments, and other personally identifiable information of 69 Google and YouTube employees that if disclosed, may subject them to unsolicited threats and harassment.

